Declaration of John T. Peterson

John T. Peterson declares, under penalty of perjury, pursuant to 28 U.S.C. §1746, that the following is true and correct:

1. My name is John T. Peterson.

2. I have personal knowledge of all facts stated in this declaration, and if called to testify, I could and would testify competently thereto.

3. I am a registered voter in Cherokee County.

4. I was a Field Support Technician for Dominion Voting this General Primary Runoff Election Day, August 11th, 2020.

5. I answered an advertisement I saw posted on July 24th that a friend had seen on Twitter and forwarded to me. (See Exhibit 1.)

6. There was no formal application process, but I filled out a Google form asking for very basic information (name, phone number, email, was I tech savvy?) that day at HelpGAElections.com.

7. There was no interview or other security check, which was worrisome for me as I felt like technical positions should not be filled this easily.

8. I went in for training on Aug 7th at what appeared to be a warehouse being used by Dominion Voting for the election – it was full of voting equipment. There were BMDs and other machines set up as a mock precinct for training. The address was 7000 Highlands Pkwy, Suite 160, Smyrna 30082.

9. The training was run by Dominion-employed technician trainers for 9 or 10 of us temporary technicians. According to the trainers, the first two, and most important, rules were:

   a. Do not talk to the Press – send them to the polling manager. We were told that as technicians we are not allowed to tell reporters anything about the new technology or our opinion about the technology.

   b. Don't touch anything. We were strictly forbidden to touch anything, even the Poll Pads. Whenever offering technical assistance, we were to have our hands behind our backs.

10. Our actual training was only 2 or 3 hours long – we were by no means experts on the equipment by the end of it.

11. As soon as we first approached the BMDs, one of the trainees remarked, "Won't everyone be able to see everyone's choices?" A trainer answered by saying something along the lines of, "There will be screens so everything will be fine."

12. They taught us how to set up Poll Pads, BMDs, printers, and scanners, and how to turn on, turn off, and use the equipment. We were also taught where all the power buttons, cables, and connections are.

13. It is my understanding that the only difference between the training we were given and that poll managers were given, is that we received Dominion

manuals which had troubleshooting steps that the poll managers' manuals

didn't, so I considered myself basically to be a "talking book".

14. We also learned some things which I considered to be high-security

information in detail, like how to open and close the polls, and where all the

security ties on the equipment were. This seemed strange to me, since poll

managers, not technicians, are expected to open and close polls, and

technicians were only supposed to be there to troubleshoot equipment

problems.

15. The only unique skill I had learned compared to poll managers, was how to

deal with a paper jam if it came up on the printers and/or scanners. Not to

unjam the paper, since I could not touch the equipment, but for scanner jams, I

was to advise whether to rescan the paper printout or whether it had been

successfully scanned and had been dropped into the printout receptacle.

16. I was not asked to take any type of oath or sign any type of confidentiality

agreement.

17. On August 11th, I was assigned to the precinct located at New Beginnings

United Methodist Church in Kennesaw, Cobb County. I was asked to arrive at

5:55 a.m. The poll manager's name was Kayla, and aside from Kayla and the

assistant poll manager, there were 4 other poll workers.

18. Other than the Poll Pads, which were still in their carrying cases, all of the

equipment was in place and connected when I arrived. Poll workers said this was the first time they were allowed to set up the equipment the night before and turn them on in the morning.

19.I am not aware what kind of overnight security there was, if any. I did note that at the time of the poll set up, there were no seals over the power buttons applied the night before, just stickers. Therefore, it appeared that if someone had entered the room overnight, they would have had unfettered access to the equipment.

20.None of the poll workers seemed familiar with setting up the Poll Pads, so I helped with assembly. I instructed the poll workers on putting all the pieces together, attaching the ID scanner, attaching the encoder, and plugging in all the different cables in the right place in the right way. I found that it would be very easy to make mistakes setting up Poll Pads because there are so many components and different cables. Even though I am technologically savvy, had I not been trained on this just 4 days prior, I am sure that I would have forgotten some of the steps, and I can see how easily a cable could be attached in the wrong way.

21.The start-up of the Poll Pads does not require a password, which is concerning to me given the importance of the data in the PollPads, and the user's ability to impact which voters are shown as eligible for voting.

22. When the polls opened, only 7 out of the 10 BMDs were working; three would not turn on. I did not notice this until I walked the room at 8 a.m. When I asked Kayla why they weren't on, she said, "We're not sure why, they're just not turning on." I was shocked that I was never asked to troubleshoot it, but my technical training did not prepare me to deal with BMDs that would not turn on, and I would not have been able to help in any case. My guess is that because Kayla's mom was the area supervisor, she had checked with her about it before I arrived. When the area supervisor arrived to check on us later, she said she thought too much power was being drawn by the other BMDs and UPSs for those 3 BMDs to operate.

23. By 9:30 a.m., technical issues had caused two more BMDs to break for a total of half of the BMDs being inoperable. One BMD printer had a paper jam, causing a "USB change" error that the poll workers had not been taught how to fix. Since I was not allowed to touch the printer and the poll workers couldn't find the piece of paper that was jammed, we had to wait for a Dominion technician in order to be able to use that BMD/printer.

24. The other BMD turned off after a simple printer issue for which both the printer and BMD were turned off. The printer became functional again, but the BMD refused to turn back on. This was not covered in my training or in the troubleshooting guide, so we had to wait for a Dominion tech.

25. Although there was supposed to be a help desk that I could call for issues serious enough to call a Dominion tech, I was never given a link, so I sent in a report to my supervisor every couple of hours about problems we encountered, and I was never told if a Dominion tech would be dispatched or not.

26. Around 10:45 a.m., a technician from Dominion (whose name was Bill or Bob,) finally showed up. Neither the poll manager nor I had been informed that he was coming.

27. He fixed the paper jam in the first printer. For the second unit, he explained that that if you connect the printer to the BMD after the BMD was turned on, it can cause the BMD to shut down. However, even when he turned everything off and turned the printer on before the BMD was turned on, the BMD still did not turn back on. He tried several other things, and finally, when he turned off the UPS and turned it back on again, the BMD worked. This was when the area supervisor said there probably wasn't enough power for all of the machines to power up.

28. As for the 3 BMDs that never turned on in the first place, the Dominion technician said, "I think the batteries (for each BMD) must be too drained to boot up, so in a couple hours, try turning them on again." This did not make sense to me since the BMDs had been connected to power since the day before, and the battery levels all showed 100%. They were not connected to

UPSs, but directly to wall outlets, so if the batteries were at 100% and they were connected to the wall, I felt they should have turned on. The technician told me that if they didn't turn on, I should get permission from Kayla and just box the 3 BMDs up.

29. After the technician left around 11:15 a.m., I asked a poll worker to come with me to check on the 3 BMDs. I asked him to press the same power button that the poll manager, assistant manager, and Dominion tech had all pressed before with no luck, and after several tries all three BMDs turned on. It seems they eventually started working for no apparent reason besides luck.

30. For most of the day, I sat by the Poll Pads. From my vantage point, I noticed that many people didn't seem to even realize that their paper printout was their actual "ballot"; the poll workers had to direct them to the printer and tell them that the printout was their ballot and that they weren't done until it was scanned. A few people then seemed to glance at the printouts, but I never saw anyone carefully verifying their choices on their printout.

31. In total, 84 voters came to vote at the precinct between 7AM and 7PM. There was no wait all day even when half the machines were down, because no more than two voters were present at a time. All of the poll workers told me that had there been nearly as many voters as for the June 9th Primary, it would've been disastrous with all of the technical issues we had at our polling place. With

more voters we would likely have had even more technical issues coming up, and there would have been a line out the door in the morning. Based on what I observed, I believe they are absolutely correct.

32. The reason I believe that we would have many more technical issues had there been more voters is that not only can every piece of equipment possibly fail, but each cable and connection between the pieces of equipment is also a point of possible failure. I feel that a paper jam should not be a technical issue that could result in a BMD not being operational for a prolonged period of time, but this is what I witnessed with the Dominion equipment.

33. Even though I was placed in a polling place as a technician, there were many issues that I could not have resolved, even with training. I believe it was pure luck that the 5 BMDs which went down became functional again, but they could have easily stayed inoperable for the rest of the day, as there was no apparent reason why they came back on when they did.
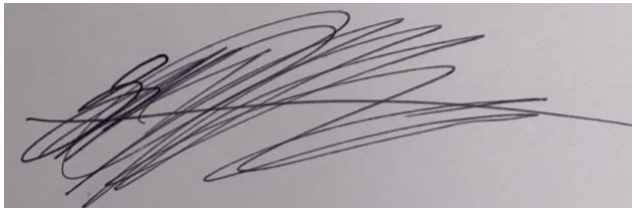
34. Also, even though there were 10 BMDs, only 2 UPCs (back-up batteries) were supplied. Had there had been a power outage, only 4 BMDs would've had back-up power. With an unprecedented voter turnout predicted in November, I fear the Dominion equipment cannot be relied on and there will be long lines again like there were in June.

35. Lastly, it took a long time to generate a report from the Poll Pads for just the

84 voters at the end of the day. The poll workers had to sit and wait for 5 minutes while it loaded the number of check-ins, which is very long time for a computer to load such simple information. If the amount of time it takes to load check-ins depends on the number of voters, it could take much longer for the report to be generated if there are thousands of voters at a precinct in November.

36. As a first-time temporary technician, my overall impression is that the technical issues we experienced would have been exacerbated by a larger number of voters, and caused exceedingly long wait times.

Executed August 18th, 2020

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John Peterson

(Exhibit 1 on next page)

John T. Peterson Exhibit 1: Dominion Voting Technician advertisement posted on social media